

REMARKS

In an Office Action mailed on February 22, 2007, claims 1, 2, 9, 15, 21, 27 and 28 were rejected under 35 U.S.C. § 102(b) as being anticipated by Gore; claims 16, 17, 21 and 22 were rejected under 35 U.S.C. § 102(b) as being anticipated by McCullough; claims 32-44, 46-49, 51-53 and 55 were allowed; and objections were made to claims 6-8, 18-20 and 22-27 as being dependent upon rejected base claims but were indicated as being allowable if rewritten in independent form.

Claim 1 has been amended to recite the ways in which the spring may be energized, pursuant to claims 6 and 8. More specifically, as amended, the method of claim 1 recites that the act of energizing the spring includes one of twisting the spring to reduce a diameter of the spring while maintaining the spring at the same axial length; and pulling the spring.

For at least the reason that the Examiner indicated that claims 6 and 8 were allowable if rewritten in independent form, Applicant respectfully requests allowance of amended claim 1. In this regard, none of the cited references teach or suggest energizing a spring by twisting the spring to reduce a diameter of the spring while maintaining the spring at the same axial length, or teach or suggest energizing a spring by pulling the spring. Thus, for at least these reasons, allowance of claims 1, 2, 9 and 15 is requested.

As amended, the method of independent claim 16 recites downhole in the well, releasing energy stored in the spring to cause the spring to radially expand to form an annular barrier in the well without the spring receiving additional energy to aid the expansion.

Contrary to the limitations of amended claim 16, McCullough explicitly describes compressing the bridging plug 10 for purposes of causing its expansion. More specifically, McCullough discloses initiating an explosion to produce a force to compress the bridging plug 10 between an anvil 34 and a mandrel 45 in order to radially expand the bridging plug. *See, for example, McCullough, 4:53-60.*

For at least the reason that McCullough fails to teach or suggest the act of releasing that is now recited in claim 16, allowance of claim 16 is respectfully requested. Claim 17 overcomes the § 102 rejection for at least the same reason as claim 16.

Independent claim 21 has been amended to incorporate the limitations of dependent claim 22. For at least the reason that the Examiner indicated that claim 22 would be allowable if rewritten in independent form, allowance of claims 21, 27 and 28 is requested.

CONCLUSION

In view of the foregoing, Applicant respectfully requests withdrawal of the remaining § 102 rejections and a favorable action in the form of a Notice of Allowance. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0317US).

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Respectfully submitted,

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